

REMARKS

With the foregoing amendment claims 1, 2, 4-17, 19, and 21-28 are pending in the application. Claims 1, 9, 17, and 24 are independent. No new matter has been added by the amendments. Applicants respectfully request reconsideration of the present application.

I. Claim Rejection(s) Under 35 U.S.C. 102

Claims 1, 4, 8, 17, 21, and 22 stand rejected under 35 U.S.C. 102(b) as being anticipated by Steinberg (US 6,006,039). Applicants respectfully traverse.

A. Claim 1

Claim 1, as amended, is not anticipated by Steinberg because Steinberg does not disclose all of the features of claim 1. For example, at the least, Steinberg does not disclose connecting a first digital image capturing device to a second digital image capturing device using a bi-directional link cable and using the bi-directional link cable to share an image captured by one of the devices.

Steinberg discloses two cameras (10 and 12). Steinberg also discloses connecting the first camera (10) to the second camera (12) using a cable (28). But, nowhere does Steinberg disclose that either the first camera (10) or the second camera (12) share captured images using the cable 28.

The Patent Office takes different view of Steinberg. The Patent Office contends that Steinberg discloses the feature of sharing images between cameras. To support its contention, the Patent Office cites to col. 2, lines 33-35 of Steinberg. However, this portion of Steinberg states merely,

... the camera allows the downloading of graphics and textual information to be included with a particular image data.

As is self evident, the above portion of Steinberg says nothing about the device to which the camera downloads the “particular image data.” Accordingly, this passage of Steinberg does not explicitly or implicitly disclose that the device to which the camera downloads the “particular image data” is another camera. In fact, a further review of the entire disclosure of Steinberg indicates that Steinberg discloses that the camera downloads

images only to a PC or computer. Steinberg discloses two cameras that share configuration information, but that is all. For example, Steinberg states,

The two cameras 10, 12 in FIG. 1 illustrate another use of the programmable camera 10. Configuration data, including an operating system, behavior parameters, data base information, and text and graphics are loaded by PC 14/external device into camera 10. At a later time, the user downloads the configuration data from the first camera 10 directly to a second camera 12. This can be done through the various means discussed above, including the cable 28, storage device 22, or radiated signals through transceivers 20.

Col. 4, lines 53-62 (emphasis added). It is clear that Steinberg does not disclose, teach or suggest transferring a captured image from a first camera to a second camera using a bi-directional link cable that connects the first camera to the second camera. As shown above, the only data shared between two cameras is configuration data. Accordingly, Steinberg does not disclose all of the features of claim 1. Thus, Applicant respectfully requests that the rejection of claim 1 be withdrawn.

B. Claims 4 and 8

Claims 4 and 8 depend from claim 1. Thus, claims 4 and 8 are patentable for at least the same reason give above with respect to claim 1.

C. Claim 17

Claim 17, as amended, is not anticipated by Steinberg because Steinberg does not disclose all of the features of claim 17. For example, as discussed above with respect to claim 1, Steinberg, at the least, does not disclose connecting a first digital image capturing device to a second digital image capturing device using a bi-directional link cable and using the bi-directional link cable to share an image captured by one of the devices. Accordingly, like claim 1, claim 17 is patentable over Steinberg. Thus, Applicant respectfully requests that the rejection of claim 17 be withdrawn.

D. Claims 21 and 22

Claims 21 and 22 depend from claim 17. Thus, claims 21 and 22 are patentable for at least the same reason give above with respect to claim 17.

II. First Claim Rejection(s) Under 35 U.S.C. 103

Claims 2 and 19 are rejected under 35 U.S.C. 103 as being unpatentable over Steinberg in view of Kiyokawa (6,204,877). Applicant respectfully traverses.

Claims 2 and 19 are patentable over Steinberg in view of Kiyokawa because neither Steinberg nor Kiyokawa, considered alone or in combination, teach or suggest all of the features of claim 2 or 19. For example, at the least, neither Steinberg nor Kiyokawa teach or suggest transmitting a real time image view from a first digital image capturing device to a second digital image capturing device, wherein the real time image view is transmitted over a bi-directional cable that directly connects the first digital image capturing device to the second digital image capturing device.

As discussed above with respect to claim 1, Steinberg does not disclose, teach or suggest transmitting any captured image from a first digital image capturing device to a second digital image capturing device using a bi-directional link cable that connects the two devices together, let alone transferring real time images between the devices. Kiyokawa does not make up for the deficient teachings of Steinberg.

Kiyokawa discloses a system wherein two cameras (1 and 3) are remotely located from one another. Kiyokawa further discloses that one of the cameras (e.g., camera 1) can transmit images to the other camera (e.g., camera 3) using a modem (2a, 2b) and the public-switched telephone network (TL) (see figure 1 of Kiyokawa). Nowhere does Kiyokawa teach or suggest directly connecting the first camera (1) to the second camera (2) using only a bi-directional link cable. That is, Kiyokawa only teaches and suggests connecting two cameras using two cables, two modems (2a, 2b), and a telephone line (TL). Thus, Kiyokawa does not teach or suggest transmitting an image from a first camera to a second camera over a bi-directional link cable that directly connects the first camera to the second camera.

Accordingly, neither Steinberg nor Kiyokawa, considered alone or in combination, teach or suggest transmitting an image from the first digital image capturing device to the second digital image capturing device over a link cable, wherein the link cable directly connects the first digital image capturing device to the second digital image capturing

device. Therefore, Applicant respectfully requests that the rejection of claims 2 and 19 be withdrawn.

III. Second Claim Rejection(s) Under 35 U.S.C. 103

Claims 5 and 6 are rejected under 35 U.S.C. 103 as being unpatentable over Steinberg in view of Watanabe (US 20020196197). Applicant respectfully traverses. Claims 5 and 6 depend from claim 1 and are patentable for at least the same reasons given above with respect to claim 1.

IV. Third Claim Rejection(s) Under 35 U.S.C. 103

Claims 7, 9, 10, 12-16, 23, 24, and 26-28 are rejected under 35 U.S.C. 103 as being unpatentable over Steinberg in view of Watanabe (US 20020196197). Applicant respectfully traverses.

With respect to the rejection of claims 7, 9, 10, 12-16, 23, 24, and 26-28 as being unpatentable over Steinberg in view of Watanabe, the Patent Office contends it would be inherent that a first camera in the system of Steinberg would be declared a master and a second camera (e.g., a camera connected to the first camera) would be declared the slave. This contention is without merit.

In order to establish that the system discloses in Steinberg inherently includes a master device and slave device, the Office Action must provide evidence that transmitting information from a first digital image capturing device to a second digital image capturing device necessarily requires that one of the devices be a “master” and the other a “slave”. See *M.P.E.P. Section 2112* (“In relying upon the theory of inherency, the Office Action must provide a basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherent characteristic necessarily flows from the teachings of the applied prior art.”) (citations omitted) (emphasis in the original). “Inherency, however, may not be established by probabilities or possibilities.” *Id.*

Accordingly, the fact that it may be possible to configure the first digital image capturing device as a “master” and the second device as a “slave” does not mean that such a configuration necessarily (i.e., inherently) exists in the system of Steinberg. In fact, to

transmit data from the first camera (10) to the second camera (12), one may operate the first and second cameras as “peers” in a “peer-to-peer” configuration. Thus, in order to transmit data between the cameras (10 and 12), it is not necessary to have one of the cameras be a “master” and the other a “slave” because the cameras may be operated in a peer-to-peer relationship. Hence, because the Office Action has not provided any facts and/or technical reasoning to support the contention that the cameras (10 and 12) are necessarily operated in a master/slave relationship (as opposed to a “peer-to-peer” relationship, for example), the Office Action has not established its theory of inherency. Therefore, Applicant respectfully requests that the rejection of claims 7, 9, 10, 12-16, 23, 24, and 26-28 be withdrawn.


V. Third Claim Rejection(s) Under 35 U.S.C. 103

Claims 11 and 25 are rejected under 35 U.S.C. 103 as being unpatentable over Steinberg in view of Watanabe and Kiyokawa. Applicant respectfully traverses. Claim 11 depends from claim 9 and is patentable for at least the same reasons given above with respect to claim 9. Claim 25 depends from claim 24 and is patentable for at least the same reasons given above with respect to claim 24.

CONCLUSION

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections, and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

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